

1 MORGAN & MORGAN
2 COMPLEX LITIGATION GROUP
3 John A. Yanchunis (Admitted *Pro Hac Vice*)
4 201 N. Franklin Street, 7th Floor
5 Tampa, FL 33602
6 Telephone: 813/223-5505
7 jyanchunis@ForThePeople.com

8 ROBBINS GELLER RUDMAN
9 & DOWD LLP
10 Stuart A. Davidson (Admitted *Pro Hac Vice*)
11 120 East Palmetto Park Road, Suite 500
12 Boca Raton, FL 33432
13 Telephone: 561/750-3000
14 sdavidson@rgrdlaw.com

15 CASEY GERRY SCHENK FRANCILLA
16 BLATT & PENFIELD LLP
17 Gayle M. Blatt (122048)
18 110 Laurel Street
19 San Diego, CA 92101
20 Telephone: 619/238-1811
21 gmb@cglaw.com

22 TADLER LAW LLP
23 Ariana J. Tadler (Admitted *Pro Hac Vice*)
24 One Pennsylvania Plaza, 36th Floor
25 New York, NY 10119
26 Telephone: 212/946-9300
27 atadler@tadlerlaw.com

28 LOCKRIDGE GRINDAL NAUEN P.L.L.P.
1 Karen Hanson Riebel (Admitted *Pro Hac Vice*)
2 100 Washington Ave. South, Suite 2200
3 Minneapolis, MN 55401
4 Telephone: 612/339-6900
5 khriebel@locklaw.com

6 ROBINSON CALCAGNIE, INC.
7 Daniel S. Robinson (244245)
8 19 Corporate Plaza Dr.
9 Newport Beach, CA 92660
10 Telephone: 949/720-1288
11 949/720-1292
12 drobinson@robinsonfirm.com

13 *Attorneys for Plaintiffs and Settlement Class Counsel*

14
15 UNITED STATES DISTRICT COURT

16
17 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

18 IN RE: YAHOO! INC. CUSTOMER DATA) No. 16-md-02752-LHK
19 SECURITY BREACH LITIGATION)
20) PLAINTIFFS' MOTION FOR FINAL
21) APPROVAL OF CLASS ACTION
22) SETTLEMENT
23) Date: April 2, 2020
24) Time: 1:30 p.m.
25) Courtroom: 8, 4th Floor
26) Judge: Hon. Lucy H. Koh
27)
28)

1 PLEASE TAKE NOTICE THAT Plaintiffs move the Court to grant Plaintiffs' Motion for
2 Final Approval.

3 Plaintiffs respectfully request that the Court finally approve the Settlement and that the
4 Court enter an Order that:

5 (1) Finally approves the Amended Settlement Agreement and Release (ECF No. 396-
6 2);

7 (2) Finally certifies the following Settlement Class under Fed. R. Civ. P. 23(b)(2) and
8 (b)(3):

9 All U.S. and Israel residents and small businesses with Yahoo
10 accounts at any time during the period of January 1, 2012 through
11 December 31, 2016, inclusive; provided, however, that the
12 following are excluded from the Settlement Class: (i) Defendants,
13 (ii) any entity in which Defendants have a controlling interest, (iii)
14 Defendants' officers, directors, legal representatives, successors,
15 subsidiaries, and assigns; (iv) any judge, justice, or judicial officer
16 presiding over this matter and the members of their immediate
families and judicial staff; and (v) any individual who timely and
validly opts-out from the Settlement Class.

17 (3) Finally appoints as Class Representatives: John Bell, Michelle Bouras, Jana
18 Brabcova, Reid Bracken, Paul Dugas, Hashmatullah Essar, Hilary Gamache, Mali
19 Granot, Kimberly Heines, Andrew J. Mortensen, Brian Neff, Jared Pastor, Brendan
20 Quinn, Deana Ridolfo, Matthew Ridolfo, and Yaniv Rivlin;

21 (4) Finally appoints as Class Counsel:

22 a. Lead Class Counsel: John Yanchunis of Morgan & Morgan Complex
23 Litigation Group;

24 b. Executive Class Counsel: Ariana Tadler of Milberg Tadler Phillips
25 Grossman LLP, Stuart Davidson of Robins Geller Rudman & Dowd LLP,
26 Gayle Blatt of Casey Gerry Schenk Francavilla Blatt & Penfield LLP, and
27 Karen Hanson Riebel of Lockridge Grindal Nauen PLLP; and
28

- 1 c. Additional Class Counsel: Daniel Robinson of Robinson Calcagnie, Inc
2 (5) Finally approves the Notice Program as implemented;
3 (6) Finally appoints Heffler as the Claims Administrator;
4 (7) Overrules all objections; and
5 (8) Grants further relief as the Court deems just and proper.

6
7 DATED: January 31, 2020

Respectfully submitted,

8
9 MORGAN & MORGAN
10 COMPLEX LITIGATION GROUP
11 John A. Yanchunis

12

13 */s/ John A. Yanchunis*
14 John A. Yanchunis

15 201 N. Franklin Street, 7th Floor
16 Tampa, FL 33602
17 Telephone: 813/223-5505
18 813/223-5402 (fax)

19 ROBBINS GELLER RUDMAN
20 & DOWD LLP

21 Stuart A. Davidson (Admitted *Pro Hac Vice*)
22 120 East Palmetto Park Road, Suite 500
23 Boca Raton, FL 33432
24 Telephone: 561/750-3000
25 561/750-3364 (fax)
26 sdavidson@rgrdlaw.com

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28 BLATT & PENFIELD LLP
29 Gayle M. Blatt (122048)
30 110 Laurel Street
31 San Diego, CA 92101
32 Telephone: 619/238-1811
33 619/544-9232 (fax)

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Karen Hanson Riebel (Admitted *Pro Hac Vice*)
100 Washington Ave. South, Suite 2200
Minneapolis, MN 55401
Telephone: 612/339-6900
612/339-0981 (fax)

ROBINSON CALCAGNIE, INC.
Daniel S. Robinson (244245)
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949/720-1292
drobinson@robinsonfirm.com

*Attorneys for Plaintiffs and Settlement Class
Counsel*

CERTIFICATE OF SERVICE

I hereby certify that January 31, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed January 31, 2020.

/s/ John A. Yanchunis
John A. Yanchunis
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LITIGATION GROUP
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7th Floor Tampa, FL 33602
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